



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DP BAR CODE NO.: 424241
PC Code: 107201
FOOD Use: Yes

EPA File Symbol NO.: 352-ONO
ACTION CODE: R300

DECISION NO.: 496487

DATE OUT: December 10, 2014

SUBJECT: End Use Product Chemistry Review
Product Name: Velpar L VU Herbicide

FROM: Hari Mukhoty, DVM, PhD.
Product Chemistry Team
CITAB / Registration Division (7505P)

Bruce Kukheres
12/15/14

TO: Aswathy Balan, RMR / Shaja Joyner, RM 24
Herbicide Branch / Registration Division (7505P)

Company Name: E. I. Du Pont
Formulation Type: Not Provided

INTRODUCTION:

The registrant has submitted one basic CSF (Dated: 10/14/2014), an amended CSF as alternate formulation (Alt. # 1; Dated: 10/15/2014) to the aforesaid basic and has also proposed a product specific label for the registration of the aforesaid product under EPA File Symbol No: 352-ONO. The registrant submitted product chemistry data under MRID: 437847-11 through 15, 436977-07, 437847-05.

CITAB has been requested to evaluate the product chemistry data required for registration of the proposed basic and alternate formulation.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Hexazinone (25.00%).
2. Has the registrant claimed substantial similarity to registered product?
[X] Yes [] No [] NA If yes: EPA Reg. No. 352-392
3. The source material of the active ingredient is registered with the Agency [Yes].
4. All inert ingredients have been screened by IIAB on 10/24/2014 and have been approved for food use.

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5. Confidential Statement of Formula(s):

☒ Basic - Dated: 10/14/2014 Re-submitted: NA
☒ Alternate - Dated: 10/15/2014 Re-submitted: NA

01-29-15
SPB
Alt-CSF withdrawn

Alternate CSF(s) complies with 40CFR §152.43: ☒ Yes ☐ No NA ☐

6. Product label

a. Ingredient statement: Nominal concentrations of AI listed on CSF(s) concur with product label (PR Notice 91-2).

☒ Yes

Is the sub statement in compliance with PR Notice 97-6?

☒ Yes ☐ No - Uses the term "Other Ingredients"
, if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA
Soluble arsenic: ☐ Yes ☒ NA
Isomeric ratios: ☐ Yes ☒ NA
Acid equivalent: ☐ Yes ☒ NA

b. Health related sub statements:

Petroleum distillate at > 10%: ☐ Yes ☐ No ☒ NA
Methanol at > 4%: ☐ Yes ☐ No ☒ NA
Sodium Nitrate / Sodium Nitrite ☐ Yes ☐ No ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): ☐ Yes ☒ No ☐ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No

Final decision of overall label acceptance will be made by the PM.

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7. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	437847-11
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis			NR	NR	
830.1750	Certified** limits (158.350)	Standard certified limits	X		A	As stated in – Basic & Alt. CSFs Dated: 10/14 & 15/ 2014
		Proposed Limits	X		A	
		Justification for wider limits				
830.1800	Enforcement analytical method #		X		A	436977-07

A = Acceptance, NR = Not Required, G = Data Gap,

W = Waiver Request, I = In Progress, NA = Not Acceptable

Analytical Method: Reverse Phase LC method using UV detector set at 254°C. Validation data were provided for determination of nominal concentration of active ingredients of the end-use product for precision, linearity and accuracy.

** Standard Certified limits have been used for the ingredients used in the formulation. The registrant has also proposed CLs. However, no explanation of the basis of proposed CLs was provided. No "certification statement" was provided.

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PC Code: 107201
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ACTION CODE: R300

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Liquid	A	437847-14
830.6314	Oxidation/reduction	Does not contain oxidizing or reducing agents.	A	"
830.6315	Flammability	Flash Point of 78° F	A	"
830.6316	Explodability	Not explosive	A	"
830.6317	Storage stability	Accelerated study for 2 weeks at 54°C / show the product is stable.	A	437847-15
830.6310	Miscibility	Product will not be mixed with petroleum solvent.	A	"
830.6320	Corrosion characteristics	Accelerated study for 2 weeks at 54°C / No visual signs of corrosion..	A	437847-15
830.7000	pH	6.0	A	437847-14
830.7100	Viscosity	4.8 Centipoises	A	"
830.7300	Density	0.968 g/mL	A	"

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I = In progress

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CONCLUSIONS:

1. CITAB has reviewed the CSFs for the proposed basic (Dated: 10/14/2014) and alternate formulation (Dated: 10/15/2014) and has found them to be acceptable. The CSFs are attached with this review and can be located in OPPIN CHEM DOCS.
2. The proposed CSF (EPA File Symbol 352-ONO) is considered substantially similar to the cited product (EPA REG. No. 352-392).
3. Product chemistry Group A and Group B data requirements are satisfied and acceptable.
4. The proposed label was screened as it pertains to the product chemistry requirements. The PM should get the "Formulation Type" from the registrant. The preferred site of insertion of Formulation Type would be on the proposed label under "Direction to Use". The proposed label contains a Physical and Chemical Hazard Statement. The final review of the proposed label and uses are the purview of the PM team.

note: Revised Basic CSF dated 01-28-15
was submitted which will supersede the
Previous Basic & Alt CSF's.
(10-14-14) (10-15-14).

SPH
02-09-15